

James A. Santucci, WSBA #7393
The Lanz Firm, P.S.
AGC Bldg., Suite 809
1200 Westlake Avenue North
Seattle, WA 98109
Telephone: (206) 382-1827
Facsimile: (206) 682-5288
Email: jasantucci@thelanzfirm.com

Honorable Karen A. Overstreet
Chapter: 7
Location: Marysville
Date: September 22, 2010
Time: 10:30 a.m.

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

INMEDIARES PRODUCTIONS, <i>dba</i>)	Case Number: 10-14343-KAO
CATALYST GAME LABS,)	
)	DECLARATION OF LOREN
Debtor.)	COLEMAN FOR ENTRY OF ORDER
)	REQUIRING POSTING OF BOND BY
)	PETITIONERS
)	
)	
)	

Loren Coleman declares as follows:

1. That he is the managing member of InMediaRes Productions, LLC (IMR) and bases this declaration upon his own personal knowledge and is competent to testify to matters contained herein.

2. Each of the three petitioning Creditors, Wildfire, LLC, Paul Stansel and Jean-Phillippe Sugarbroad signed the Involuntary Petition for Chapter 7 Bankruptcy.

3. The \$37,236.59 claim of Wildfire, LLC is severely contested by IMR. The claim is not liquidated, is subject to various set-offs not otherwise accounted for or they have been

1 valued improperly. We estimate that a correct accounting will all but negate this claim. It is
2 totally unliquidated and disputed.

3 3. The estimated claim of \$18,000 by Paul Stansel, at the commencement of this
4 involuntary petition was being paid on a monthly basis at about 969.73 with the understanding
5 the remaining balance would be paid in September 2010. Payments have continued monthly
6 since then and we are on schedule to pay Mr. Stansell in full in September 2010 as has been the
7 plan.

8 4. The claim \$2,924.64 claim of Jean-Phillipe Sugarbroad is for services. While he
9 may have done work under our former operations manager, who left IMR earlier this year. We
10 were not left with any documentation as to the hiring of Mr. Sugarbroad. We have no record of
11 the itemized work done and Mr. Sugarbroad won't cooperate in itemizing what it is he did for the
12 amount claimed. We can't determine what it is he may be owed, if he won't work with us.

13 5. The filing of this involuntary bankruptcy has cost this company a minimum of
14 \$20,000 - \$30,000. It has caused credit issues with obtaining printing resulting in a significant
15 delay in the printing of six books. It has made other vendors wary of doing business and stands
16 in the way of forging other partnerships. IMR has gross sales in excess of \$1,000,000 per year.
17 The filing has resulted in unwarranted damage to business reputation and will continue to do so.

18 6. Should the matter proceed to trial, attorneys fees and costs will remain significant.

19 7. There is a likelihood this matter will be dismissed and IMR seeks protection for
20 damages caused and allowed under 11 USC Sec. 303 (i).
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22 I certify or declare under penalty of perjury under the laws of the State of Washington
23 and the United States of America, that the foregoing is true and correct.
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2 Dated at Spokane Washington this 31st day of August, 2010.

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5 Loren Coleman, Declarant
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DECLARATION OF LOREN COLEMAN FOR ENTRY OF ORDER
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Coleman in Support of Motion for Bond.doc.doc
PAGE 3.

The Lanz Firm, P.S.
Suite 809, AGC Building
1200 Westlake Avenue North
Seattle, WA 98109
206-382-1827 FAX 206-682-5288